

Michael D. Cohen

1399 Franklin Avenue, Suite 200
Garden City, New York 11530

April 12, 2021

The Honorable John G. Koeltl
United States District Judge
500 Pearl Street
New York, New York 10007

Re: *Cohen v. United States of America, et al.*, No: 20-cv-10833 (JGK)

Dear Judge Koeltl,

Petitioner respectfully submits this letter to Your Honor in furtherance of Petitioner's Reply to Respondent's Answer for a Writ Of Habeas Corpus, submitted on March 25, 2021.

Specifically, Petitioner requested and continues said request that this Honorable Court and Your Honor act upon this Petition with *genuine urgency* as each day that this matter is pending is a day that Mr. Cohen is incarcerated unlawfully. Petitioner therefore asked, and continues to ask; (i) that the Court order his release pending adjudication of this statutory question to immediately abate the ongoing and irreparable harm of his excessive confinement, and (ii) that the writ be granted for the reasons stated in Mr. Cohen's Petition... (page 8).

The impetus for said request stems from the well-known fact that The Bureau of Prisons conspicuously slow walks these petitions to moot the determination; especially in matters like the one before Your Honor where Petitioner will be released from home confinement in 7 months.

Supplementarily, I wish to respectfully bring to this Court's attention Government's reply to the petition of Bains v. Quay (21-cv-00353). Government appears to have finally acknowledged and abandoned their misguided and flawed defenses of ripeness and exhaustion of administrative remedy. Rather, Government allocates, albeit without explanation, a 62.5-day reduction of sentence for Bains' productive activity at LSCI Allenwood. Government's reply states, "At most, however, the work yields 500 hours of EBRR credit. (Id.) Thus, again assuming that Bains' work with FPI is not otherwise disqualifying, he accrued 500 hours EBRR credit with FPI, or another 62.5 days." (Page 14)

It is for these reasons that I beseech Your Honor to prevent Government from impinging on my constitutional rights (again) by granting the relief sought in my petition or, in the alternative, removing me from home confinement pending a hearing or the disposition of this matter.

Respectfully submitted,

/s/ Michael Cohen

Michael D. Cohen
Pro Se Petitioner
1399 Franklin Avenue, Suite 200
Garden City, New York 11530
